



May 21, 2021

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: **CPF 1-2021-016-NOA**
Notice of Amendment – Tallgrass Interstate Gas Transmission, LLC

Dear Mr. Burrough,

Tallgrass Interstate Gas Transmission, LLC (TIGT) has made procedure modifications in response to the Notice of Amendment (NOA) received on April 26, 2021 stemming from a procedure review conducted during an inspection of the Huntsman gas storage field in Cheyenne County, Nebraska. The highlighted text indicates the enhancements made to each procedure in correlation to each item contained in the NOA.

Item 1

The frequency of well integrity evaluation data from third-party well owner/operators has been incorporated into the *GSIMP26 – Third Party Activity Surveillance* procedure; the new procedure language is highlighted below.



UNDERGROUND GAS STORAGE STANDARD

No.	GSIMP 26
Title:	Third Party Activity Surveillance
Revised:	August 1, 2020

for Pipeline Operations personnel to obtain and record information and provide it to the Gas Storage Engineer for analysis and update of the risk assessment and resulting surveillance monitoring plan that is part of the risk management plan.

To facilitate execution of third-party activity surveillance monitoring, The Gas Storage Operations Manager shall request well integrity evaluation data from third-party well owner/operators following a frequency not to exceed 3 years.

Item 2

The *GSIMP 8 – Risk Management* procedure has been revised to illustrate the assessment of threats and hazard interaction as shown below.

3.7. Risk Source (Hazard and Threat) Identification

[Attachment B – API 1171 Table 8-1](#) addresses risk sources, including:

- Well Integrity deterioration: Likelihood of loss of containment due to corrosion, material defects, erosion, equipment failure, annular flow, cement bond failure, cathodic protection system interference, valve failure, gasket failure, thread leaks, mechanical fatigue/vibration.
- Design - casing and cement: Likelihood of loss of containment due to inadequately completed wells, sealed plugged well(s), failure of cement squeeze job perforations or stage tool, pressure rating of components.
- Human/Organizational Reliability/Operation and Maintenance Activities: Likelihood of loss of containment due to inadequate procedures, failure to follow procedures, inadequate training, inexperienced personnel and/or supervision.
- Well Intervention: Likelihood of loss of containment due to loss of control of a storage well while drilling, reconditioning, stimulation, logging, working on downhole safety valves.
- Third Party Damage (Intentional/Unintentional Damage): Likelihood of loss of containment due to vandalism, terrorism, vehicular impact, subsurface impact, general construction, drilling/mining.
- Outside Force - Natural Cause, Weather-related, Ground Movement: Likelihood of loss of containment due to floods, landslides, earthquakes, earth and/or water and/or air mass movements, subsidence/compaction, other earth forces inducing shear, compression, tension or impact, struck by objects such as trees, rockfalls.

The analyst shall evaluate potential threats and hazards affecting storage wells and reservoirs, determine susceptibility to events caused by such hazards and threats, and assess the potential for cascading events or for increased severity of events due to threat and hazard interaction. An example of threat interaction assessment includes the relationship of the threat of casing damage during well drilling or service work that could exacerbate corrosion processes.

As always, we appreciate the feedback provided by your agency, and the opportunity to improve our procedures. Please do not hesitate to contact me should you have any questions or would like to discuss any of the material provided in further detail.

Sincerely,


Jennifer Eckels

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